

**IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE**

**ZACHARY RYE ADAMS
PETITIONER**

VS.

STATE OF TENNESSEE

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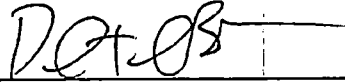
NO. 17-CR-10-PC

**MOTION FOR LEAVE TO ADD AMENDMENT TO POST CONVICTION RELIEF
PETITION**

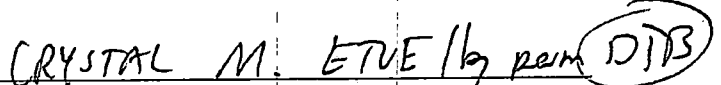
Comes now the Petitioner, by and through Counsel, and moves this Court to add the attached proposed amendment to the existing second amended post-conviction relief petition. For cause, Petitioner would cite the March 2025 disclosure by the State that the Video labelled "BP" was in fact the ATM video is the trigger for the Petitioner's need to amend the pleadings. Further, the Petitioner requested and the Court ordered the State to prove facts pursuant to its motion to dismiss on paragraph related to this video in the existing pleadings. The State has still not pled such facts pursuant to the Court's order and Rule 28 Sec. 5(G). The Petitioner relies upon Rule 28 Sec. 8(D)(5) that states that amendments "shall do so freely when the presentation on the merits of the cause will otherwise be subserved." The Petitioner submits that a continuance should not be needed by the State to "meet the evidence."

FILED 2 DAY OF May, 2025 AT 3 AM PM
BY Tammie Wolfe Clerk
Tammie Wolfe Clerk

RESPECTFULLY SUBMITTED:



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NOTICE: I WILL PRESENT THIS MOTION AS DIRECTED BY THE COURT.

CERTIFICATE OF SERVICE

The undersigned certifies that he has on the 2 day of MAY 2025,
sent a true and correct copy of the following to the person(s) listed below in compliance with the
Tennessee Rules of Civil Procedure, Rules 5 and/or 5A, by the following indicated method(s):

Amy Weirich: apweirich@tndagc.org

Christopher Boiano: cvboiano@tndagc.org

- ☐ U.S.P.S., first-class postage pre-paid
☐ Via Fax
☒ Via Email
☐ Hand-delivery by:
☐ Certified Mail, Return Receipt Requested



DOUGLAS THOMPSON BATES, IV